

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Nicole Cumberbatch *aka* Nicole Cumberbatch-Cox
dba Gloria's In & Out III *dba* Gloria's In & Out 3,

Chapter 7
Case No. 1-21-40360-ess

Debtor.

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**STIPULATION AND ORDER FURTHER EXTENDING
THE TIME TO OBJECT TO THE DEBTOR'S DISCHARGE**

WHEREAS, on February 13, 2021, Nicole Cumberbatch *aka* Nicole Cumberbatch-Cox *dba* Gloria's In & Out III *dba* Gloria's In & Out 3 (the "Debtor") filed a voluntary petition for relief under Chapter 7 of Title 11 of the United States Code in the United States Bankruptcy Court for the Eastern District of New York, at Brooklyn; and

WHEREAS, Debra Kramer was appointed the interim Chapter 7 Trustee (the "Trustee") for the estate of the Debtor; and has since qualified as, and is, permanent Trustee in this matter; and

WHEREAS, as reflected in the Notice of Chapter 7 Bankruptcy Case, May 24, 2021 was fixed as the last day to file a complaint objecting to the discharge of the Debtor; and

WHEREAS, on May 17, 2021, the Chapter 7 Trustee filed a Motion for Entry of an Order Extending Time to Object to the Debtor's Discharge and File a Motion to Dismiss (ECF Dkt. 81); and

WHEREAS, by Order, dated June 30, 2021, the time period within which the Trustee and/or the United States Trustee may file a complaint objecting to the Debtor's discharge pursuant to 11 U.S.C. § 727 was extended from May 24, 2021 up to and

including August 18, 2021, without prejudice to the right of either the Trustee and/or the United States Trustee to seek a further extension or extensions of such time (ECF Dkt. 81); and

WHEREAS, the Trustee is investigating the Debtor's financial affairs; and

WHEREAS, the Debtor has consented to further extend the time period within which the Trustee and/or the United States Trustee may file a complaint objecting to the Debtor's discharge pursuant to 11 U.S.C. § 727 from August 18, 2021 up to and including November 17, 2021, without prejudice to the right of either the Trustee and /or the United States Trustee to seek a further extension or extensions of such time; and

NOW, THEREFORE, it is stipulated and agreed by and between the undersigned that:

1. The time period within which the Trustee and/or the United States Trustee may file a complaint objecting to the Debtor's discharge pursuant to 11 U.S.C. § 727 is further extended from August 18, 2021 up to and including November 17, 2021, without prejudice to the right of the Trustee and/or the United States Trustee to seek a further extension or extensions of such time.

2. This stipulation may be executed in counterparts and each such counterpart together with the others shall constitute one and the same instrument, and facsimile signatures herein shall be deemed to be original signatures.

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3. The parties hereto consent to the entry of the stipulation as an order in this case.

Dated: East Hampton, New York
August 5, 2021

By: /s/ Debra Kramer, Chapter 7 Trustee
Debra Kramer, Chapter 7 Trustee
of the Estate of Nicole Cumberbatch aka Nicole
Cumberbatch-Cox dba Gloria's In & Out III
dba Gloria's In & Out 3
10 Pantigo Road, Suite 1
East Hampton, New York 11937
Telephone: (516) 482-6300

Dated: New York, New York
August 5, 2021

Morris Tenenbaum PLLC

By: /s/ Brian J. Hufnagel
Brian J. Hufnagel, Esq.
87 Walker Street, Floor 2
New York, NY 10013
Telephone: (212) 620-0938

Attorneys for Nicole Cumberbatch *aka* Nicole
Cumberbatch-Cox *dba* Gloria's In & Out III *dba*
Gloria's In & Out 3, Debtor

SO ORDERED: